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April 30, 2015

Via ECF and First Class Mail

The Honorable Lorna G. Schofield
United States District Judge for the
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Thind v. HF Management Services, LLC, Civil Action No. 14-CV-09539 (LGS)

Dear Judge Schofield:


We are counsel for Plaintiff in the above-referenced matter. We write on behalf of all parties to respectfully request a one-month adjournment of the time for discovery to conclude and for Plaintiff to file his conditional certification motion.

The parties have been working in good faith to exchange discovery. To date, Defense Counsel has produced over 200,000 pages of documentary discovery. Plaintiff submits that it would be impossible to review this volume of documents and to take depositions based on these documents prior to Plaintiff's May 25, 2015 deadline to file a conditional certification motion. Defendant does not oppose this request.

Accordingly, the parties jointly request that the Court extend the discovery schedule in this case. The parties respectfully propose that the Court adjourn Plaintiff's time to make its conditional certification motion by one month to June 25, 2015, with Defendant's response to be filed on or before July 9, 2015, and Plaintiff's reply to be filed on or before July 16, 2015. The parties further jointly request an extension of the deadline for the completion of discovery from July 15, 2015 to August 15, 2015. To keep the Court apprised of the progress of discovery, the parties respectfully suggest that they submit an additional joint status letter on June 9, 2015.

The parties thank the Court for the courtesy of entertaining this request.

Respectfully submitted,



Samuel Veytsman, Esq.

For the Firm

C: All counsel of record (via ECF)